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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LOUISIANA MUNICIPAL POLICE
EMPLOYEES' RETIREMENT SYSTEM,
Derivatively on Behalf of Itself, and All Others
Similarly Situated,

Plaintiffs,

v.

DAN R. HESSE, JOSEPH J. EUTENEUR,
ROBERT H. BRUST, PAUL N. SALEH,
JAMES H. HANCE, JR., ROBERT R.
BENNETT, GORDON M. BETHUNE,
LARRY C. GLASSCOCK, V. JANET HILL,
SVEN-CHRISTOPHER NILSSON,
WILLIAM R. NUTI, and RODNEY O'NEAL,

Defendants,

-and-

SPRINT NEXTEL CORP.,

Nominal Defendant.

Civil Action No. 1:12-cv-04017-ALC-JCF

ECF Case Electronically filed

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, dated September 19, 2012, the Affidavit of Kimberly A. Donnelly, sworn to September 18, 2012, and the exhibits thereto, and all the prior pleadings and proceedings had herein, defendants Dan R. Hesse, Joseph J. Euteneur, Robert H. Brust, Paul N. Saleh James H. Hance, Jr., Robert R. Bennett, Gordon M. Bethune, Larry C. Glasscock, V. Janet Hill, Nilsson, William R. Nuti, and Rodney O'Neal, and nominal defendant Sprint Nextel Corp., by and through their undersigned counsel, will move this Court before the Honorable Andrew L. Carter, U.S.D.J., at the United States Courthouse located at 500 Pearl Street, New York, New York, at a date and time to be determined by the Court, for an Order pursuant to Federal Rules of Civil Procedure 12(b)(6) and 23.1 dismissing the complaint (removed to this Court on May 23, 2012), for the reasons set forth in the accompanying memorandum, and granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that responsive papers, if any, are required to be filed on or before October 18, 2012.

Dated: New York, New York
September 19, 2012

CHADBOURNE & PARKE LLP

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